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ABSTRACT

This paper presents guidelines on the role that Parent Advisory Councils (PACs) can play in implementing projects under Chapter I of the Education Consolidation and Improvement Act, which replaces Title I of the Elementary and Secondary Education Act as of July, 1982. Under Chapter I, school districts are no longer required to establish PACs that were mandated under Title I; instead, local school officials are only required to consult with parents and teachers of children in Chapter I funded projects. The paper suggests that in light of these changes, PACs should work in 1981-82 to assure that parents and other citizens have access to the planning and implementation of Chapter I projects in schools and school districts during 1982-83. Among the activities that the paper identifies for PACs are: 1) determining the nature and extent of the "consultation" requirement in Chapter I; 2) determining the likely effect of Federal budget/policy initiatives on local Chapter I programs for 1982-83; 3) developing contingency positions for school programs should Federal budget reductions be required; 4) ensuring that the flexibility provided by Chapter I legislation is used to improve education for disadvantaged children; and 5) studying how Federal block grants to States provided for by Chapter II of the Act may be used to benefit educationally disadvantaged children. (MJL)

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Preparing for Chapter I:

What Title I Parent Advisory Councils (PACs) Can Do in 1981-1982

Effective July 1, 1982, Title I of the Elementary and Secondary Education Act will be replaced by Chapter I of the Education Consolidation and Improvement Act. Under Chapter I school districts will continue to receive Federal funds for the purpose of providing extra educational assistance to low-achieving children concentrated in high poverty areas. In this respect, Chapter I is identical to Title I.

However, there are significant differences between Chapter I and Title I. Chapter I contains many fewer detailed requirements; in fact, its length is about half that of Title I. While Chapter I addresses such traditional Title I concepts as "maintenance of effort," "supplement not supplant," and "comparability," the requirements are in some cases different than in the Title I law.

One significant change in the new law is that it does not mandate a specific structure to assure that parents and other citizens are involved in the planning, implementation, and evaluation of Chapter I funded projects. School districts will no longer be required to establish Parent Advisory Councils that were mandated by Title I. Instead, local school officials will only be required to consult with parents and teachers of children in Chapter I funded projects.

This means that beginning in the 1982-1983 school year many Parent Advisory Councils will be eliminated. Other PACs may be retained in some form but selected through a procedure which is more convenient to school officials. Some school officials will choose other means to assure the "consultation" Chapter I requires. It is important to understand that the law no longer requires any particular structure to assure parent involvement.

In light of these impending changes in the law, Parent Advisory Councils need to make the best use of the 1981-1982 school year

to assure that in 1982-1983 school districts adequately provide for the access of parents and other citizens to the planning, implementation, and evaluation of Chapter I funded projects. During 1981-1982 there is also a role for PACs to play in working with school officials to make sure plans are developed for the effective implementation of Chapter I in 1982-1983.

What PACs Can Do

1. Obtain and study a copy of the Education Consolidation and Improvement Act.

   During the past fifteen years members of Parent Advisory Councils have come to understand the importance of being familiar with Title I law. Now it is important to be familiar with Chapter I of the Education Consolidation and Improvement Act. A copy of the law can be obtained from the office of the local member of the U. S. Congress. A copy can also be obtained from one of the organizations listed on the last page of this paper. In the coming months other important documents will be published concerning Chapter I. It is important to ask to be kept informed of these documents as they emerge; such requests can be made to any of the organizations listed here. One such document is "Questions and Answers Concerning the Education Consolidation and Improvement Act of 1981 - Chapter I" prepared by the U. S. Department of Education in October, 1981. This should be available from the Title I office at the State level, or from a local Title I official. PACs may also want to obtain the handbook on the Education Consolidation and Improvement Act prepared by the National School Boards Association. The handbook was prepared primarily for local school officials. It can be ordered for $7.95 from Mary Lou Siegfried, NSBA, 1055 Thomas Jefferson Street, N. W., Washington, D. C. 20007.

2. Negotiate with local school districts concerning how they will comply with the Chapter I "consultation" mandate in 1982-1983.

   The new law requires that Chapter I funded programs and projects must be "designed and implemented in consultation with parents and teachers" of children participating in Chapter I funded programs. It is not likely that the U. S. Department of Education will provide much helpful guidance to local school officials concerning what is meant by "consultation." The law permits school officials to interpret this requirement in almost any way they want.

   This means the operational definition of "consultation" is up for grabs. It is important for PACs to take the initiative to consider what they would like for the word "consultation" to mean. Should it mean retaining the PAC as it currently exists? Should it mean retaining the concept of the PAC but changing its membership so it only includes parents and teachers of children in Chapter I

funded projects? Should it mean the local federal programs official calling in a few parents and teachers and having a nice chat? Should it mean conducting a survey of parents and teachers? These are all questions PACs should consider in thinking through their own definition of what "consultation" should mean. It is important to consider how the new Chapter I requirement might be viewed by the local federal programs official or superintendent.

Once a PAC has given serious consideration to this issue, and has developed a position, it should then proceed to raise this matter with the local federal programs official, or any other person who might be responsible for interpreting the "consultation" requirement in 1982-1983. This should be approached as a negotiation. It should be assumed that local officials intend to comply with the law, and that the issue to be resolved is how the school district intends to comply. This negotiation must be serious and respectful on both sides with efforts to reach a specific conclusion about how "consultation" will occur in 1982-1983. It is very important for a PAC to try and get the school district to commit itself to a specific process for "consultation" and for this process to be described in writing before the end of the 1981-1982 school year.

3. <u>Focus on "consultation" within the context of the current Title I mandates.</u>

As school districts have attempted to comply with the current Title I mandates for parent involvement they have chosen to interpret parent involvement in many ways. Some districts have used Parent Advisory Councils primarily as a means to get volunteers into the schools. Other districts have used PACs to advance the concept of parent education. In other cases PACs have done little more than meet four times a year to listen to educators, or to attend an annual banquet. These are not inappropriate activities, but they have nothing to do with the mandated role of Title I PACs. That role has been for the PAC to advise the local school district on the planning, implementation, and evaluation of Title I programs and projects. Very few PACs have actually carried out that role because they have let local school officials define other roles for them.

Because of the changes that will occur as a result of Chapter I it is important for PACs to consider the concept of "consultation" in a way that is relevant to the planning, implementation, and evaluation of Chapter I funded projects. "Consultation" should not be allowed to become so diluted in its meaning that it is a worthless concept that has no practical value for the effectiveness of Chapter I funded projects. Here are some things to keep in mind:

* The actual wording of Sec. 556 (b) (3) of Chapter I;

  "...ARE DESIGNED AND IMPLEMENTED IN CONSULTATION

  WITH PARENTS AND TEACHERS OF SUCH CHILDREN;"

* The dictionary definition of design is "to conceive and plan out in the mind." Therefore, this means that local school officials should be consulting with parents and teachers before Chapter I funded projects are finalized, or committed to paper.

* The dictionary definition of implement is "to carry out; to put into practice." This simply means that local school officials should be consulting with parents and teachers throughout the school year, not just when Chapter I funded projects are being planned.

* Under Title I law the burden has been on PACs because the word advise means "to give advice to; to inform, notify." This meant it was up to the PAC to take the initiative and to play an active role. However, under Chapter I the burden is on local school officials because the word consult means "to ask the advice or opinion of." In other words, it is now up to school officials to obey the law by taking the initiative to seek out the views of parents and teachers of educationally disadvantaged children. This is why it is so important for PACs to determine in 1981-1982 how school officials will go about asking the advice or opinion of parents and teachers in 1982-1983.

* Under Chapter I parents and teachers still must be provided with an opportunity to contribute their views about the planning and implementation of the program. "Consultation" does not negate the emphasis of the law on parent/teacher input regarding planning and implementation. It merely changes the process by which that input is provided.

4. Find out/influence what the State will require concerning "consultation," parent and citizen participation, and other regulations.

Under Section 165 of Title I States were encouraged to develop rules, regulations, procedures, guidelines, and criteria for local school districts to follow in applying for and administering Title I funds. This section is not in Chapter I. Some federal program officials of state departments of education are very nervous about the omission of this section from Chapter I because they will no longer be able to say the Federal Government is making them develop and publish such State regulations. However, it is clear that Chapter I does not prevent States from imposing requirements on the use of Chapter I funds.

Some States will issue regulations concerning Chapter I funds. Others may not do so for political or bureaucratic reasons, or they may issue only very narrow regulations relating to fiscal accountability.

Parent Advisory Councils can contact, by letter or personal visit, their appropriate state department of education to determine the plans for issuing regulations, procedures, or guidelines for Chapter I. Communication should be with the state superintendent of education or the state director of federal programs. PACs may want to raise specific points of concern, such as the need for the State to require that school districts adopt some defined procedure or structure to assure "consultation." Several PACs from different school districts should join together to send representatives to meet with State officials to determine the plans for issuing regulations. PACs should keep in mind that there will be a minimum of regulations from the Federal level so it is important to view the State as the level deserving attention if it seems that additional guidance will be needed to assure effective implementation of the law.

5. Keep informed about how Federal budget/policy initiatives will likely affect the Chapter I program at the local level for 1982-1983.

Many people who have an interest in Title I are coasting on their experience with and assumptions about Title I administration and enforcement during the past fifteen years. Relatively speaking, the role of the Federal Government in relation to Title I has been supportive, and Title I administration and enforcement has improved over the years. Many people assume this trend is continuing. It is not.

The Federal role in supporting public education is now rapidly changing. The fact that the Education Consolidation and Improvement Act has been enacted is but one indication of the change that is occuring. President Reagan has asked for huge cuts in the budget for Chapter I. He is seeking to dismantle the Department of Education. Half of the positions in that section of the Department that administers Chapter I will be cut. There is every indication that the Federal Government will do little more than distribute Chapter I funds.

All of these initiatives have implications for how Chapter I operates at the local level. Many local program administrators do not know on a day to day basis how to plan for the implementation of Chapter I. Many State program administrators also do not know. It is important for PACs to have accurate information about unfolding events at the Federal level. Just as important is the need for PACs to understand that they can no longer count on the Federal Government to support them or intervene in their local school district (Chapter I, for example, contains no mandated complaint procedures).

PACs need to have their own source of information about Federal initiatives that will affect how Chapter I is implemented in their respective school districts. They cannot rely on sketchy reports in their local newspaper, and they should not have to rely on having information provided or interpreted to them by the local school officials.

PACs should consider subscribing to one or more publications that regularly and accurately report on what steps are being taken at the Federal level that will affect local programs. One or two reliable members of the PAC should be assigned to receive the subscriptions, and charged with regularly reporting to the PAC about significant developments at the Federal level. A list of possible publications is at the end of this paper.

6. Develop contingency positions on what cuts should be made in the local Chapter I program for 1982-1983, should such cuts be necessitated by Federal budget reductions.

President Reagan is continuing to insist that sizable cuts should be made in Federal aid to programs for educationally disadvantaged children. These cuts may be reflected in the Federal Budget for the 1982 fiscal year. Because Chapter I is forward funded this means the amount of money available for Chapter I programs at the local level in 1982-1983 would be affected.

Local school districts are under increasing financial pressures and it is doubtful they will have the capacity to take up the slack created by any cuts in Chapter I. Therefore, it may not be realistic to expect that school districts can make up cuts in Chapter I funds by taking money from another pot. Many programs, whether they are funded by Federal, State, or Local funds are feeling the financial pinch.

This means that school districts may have to make some hard choices. In fact, they may have to make some hard choices about how funds are used within programs. For Chapter I funded programs do you cut programs, services, teachers, aides, or what?

PACs may find themselves faced with these dilemmas as they help plan for the 1982-1983 school year. Rather than being asked to quickly respond to how a school district should contend with less money under Title I/ Chapter I, the PAC should be prepared with contingency positions on how the cuts should be handled. This calls for the PAC to understand the current Title I budget and how it supports specific programs. It means the PAC will have to struggle with difficult issues. Should a parent involvement coordinator be retained if the choice is to cut a full time teacher funded by Title I/Chapter I? How necessary and useful are in-service programs for teachers?

Is it better to cut aides or instructional staff? How much money can be saved by significantly cutting the budget for materials and supplies? What is the trade-off between cutting home-school liasons, psychologists, central office program consultants, and instructional staff?

These are hard issues and may lead to controversial decisions. Yet is seems better for the PAC to take the initiative to develop contingency positions on such matters well before the issue is raised by the federal programs coordinator who announces that cuts will have to be made. Above all, the PAC should consider the subject of cuts with a view towards what is necessary to protect the educational interests of children participating in the Chapter I funded programs. In any consideration of cuts there is a need for the PAC to play its role as the advocate for educationally disadvantaged children.

7. Challenge local federal program coordinators to use the flexibility in Chapter I to IMPROVE the education provided to disadvantaged children.

For years school officials have complained about the complex law and regulations accompanying Title I. These regulations have been blamed for paperwork and certain instructional approaches. The implication was that only if the burden of regulations was lifted could the program administrators work to improve the implementation of Title I.

Now the law has been simplified. Chapter I is about half as long as Title I. The regulations will be very limited. Effective Federal enforcement of the law and regulations is very doubtful.

School officials now have more latitude and discretion in administering Chapter I. The primary question is how they will use this greater flexibility. Will it only be used to make things easier for the administrators, for their own convenience? Or will it be used to improve the quality of the Chapter I funded programs? Even with less money, how will the flexibility in Chapter I be used by federal program coordinators to strengthen the instruction that is supported by Chapter I?

These are questions that PACs need to raise, even if PACs don't have the answers.

8. Be vigilant that the flexibility in Chapter I is not used to dilute the impact of the available Chapter I funds.

Because local school officials are under increasing fiscal pressures, and because of the flexibility in Chapter I, there may be a temptation to use the funds in inappropriate ways. PACs need to make sure that Chapter I requirements

regarding maintenance of effort, comparability, and supplement not supplant are followed. Without a vigorous monitoring and enforcement role by the Federal Government (and by some States), PACs will have to assume a greater responsibility for making sure Chapter I funds are used to benefit educationally disadvantaged children. If there are questions about the legality or appropriateness of plans to use Chapter I funds in 1982-1983 consult with the staff of the Federal Education Project (address on next page).

9. Learn about Chapter II and the potential for utilizing Chapter II funds to benefit educationally disadvantaged children.

Chapter II of the Education Consolidation and Improvement Act is the "education bloc grant." About thirty Federally funded programs that were formerly separate categorical programs have been consolidated. This means that beginning in 1982-1983 Federal funds which were available under these separate programs will be distributed in a "bloc grant" to the States. Each State will keep 20% of the money at the State level and allocate the remaining 80% among local school districts. This money can be used for a wide range of purposes at the local level. For all practical purposes it is entirely up to the school districts to determine how they will use the money, although it must be used for the functions set forth in Chapter II. If a school district has not been receiving funds under some of the categorical programs that have now been folded into the bloc grant, this may represent "new" money to the district. However, if a district has been utilizing funds under the categorical programs (seeking program grants was often on a competitive basis) it may end up getting less money because the Federal funds are being reduced and are being spread among more districts.

Parent Advisory Councils will want to obtain and study a copy of the Chapter II law, and also request a copy of "Questions and Answers Concerning the Education Consolidation and Improvement Act of 1981--Chapter II." This material can also be obtained from the office of a U. S. Congressperson, or State or local federal program administrators.

Because Chapter II can be used for so many purposes, it will be of particular interest to PACs in districts which are facing cutbacks in Chapter I funded programs. There is at least the potential for some Chapter II funds to be used for purposes similar to those funded by Chapter I. In any case, PACs should understand the relationship between Chapter I and Chapter II funded programs at the local level, particularly in terms of how Chapter II funds can be used to serve educationally disadvantaged children who do not receive assistance under any other programs.

Prepared by Hayes Mizell, 11/81

Who to Contact for More Information About Chapter I

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